

JOSEPH P. RUSSONIELLO (CSBN 44332)
United States Attorney

BRIAN STRETCH (CSBN 163973)
Chief, Criminal Division

DENISE MARIE BARTON (MABN 634052)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102
Telephone: (415) 436-7359
Facsimile: (415) 436-7234
denise.barton@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CR No. 07-0454 PJH
)	
Plaintiff,)	
)	
v.)	STIPULATION AND [PROPOSED] ORDER
)	EXCLUDING TIME FROM JANUARY 23,
)	2008 THROUGH FEBRUARY 20, 2008
SHANNON BLAYLOCK,)	
aka ARLANDYS RICHARDSON,)	
aka "DADDY RICH",)	
TAWAKONI SEATON,)	
aka TONI,)	
)	
Defendants.)	
)	
)	

On January 23, 2008, the parties in this case appeared before the Court. Counsel for the United States and counsel for co-defendants Blaylock and Seaton stipulated that the case is a complex case under 18 U.S.C. § 3161(h)(8)(B)(ii). These parties also stipulated that time should be excluded from the Speedy Trial Act calculations from January 23, 2008 through February 20, 2008. These parties represented that granting the continuance was necessary for effective preparation of counsel, taking into account the exercise of due diligence, to afford counsel time to review discovery. See 18 U.S.C. § 3161(h)(8)(B)(iv). Counsel for co-defendant Gardner

1 objected to the exclusion of time on all grounds.

2 SO STIPULATED:

3
4 JOSEPH P. RUSSONIELLO
United States Attorney

5
6 DATED: April 30, 2008

7 /s/ Denise Barton
8 DENISE MARIE BARTON
Assistant United States Attorney

9 DATED: April 30, 2008

10 /s/
MICHAEL STEPANIAN
Attorney for SHANNON BLAYLOCK

11
12 DATED: April 30, 2008

13 /s/
KENNETH WINE
Attorney for TAWAKONI SEATON

14
15 **[Proposed] Order**

16 As the Court found on January 23, 2008 and for the reasons stated above, the Court finds that
17 the ends of justice served by the continuance outweigh the best interests of the public and the
18 defendants in a speedy trial and that time should be excluded from the Speedy Trial Act
19 calculations from January 23, 2008 through February 20, 2008 for effective preparation of
20 counsel and due to the complexity of the case. See 18 U.S.C. §3161 (h)(8)(A). The failure to
21 grant the requested continuance would deny counsel reasonable time necessary for effective
22 preparation of counsel, taking into account the exercise of due diligence, and would result in a
23 miscarriage of justice. See 18 U.S.C. §3161(h)(8)(B)(iv).

24 SO ORDERED.

25
26 DATED: _____

27 HONORABLE. PHYLLIS J. HAMILTON
28 United States District Judge